

## Integrated Pest Management in Section 8 Multifamily Housing

### IPM and Pesticide Use

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## Outline

- HUD's guidance on IPM
- IPM in practice
- Pesticides

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## Making homes healthy

- IPM is part of a nationwide Healthy Homes movement to reduce housing-based health hazards
- A healthy home is:
  - Dry
  - Clean
  - Ventilated
  - Safe
  - Contaminant-free
  - Maintained
  - **Pest-free**

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### What does HUD say about pest control?

HUD has three policies related to pests:

- Promotion of Integrated Pest Management (PIH 2011-22)
- Uniform Property Condition Standards—for project-based Section 8 properties
- Housing Quality Standards for Housing Choice Voucher units and project-based voucher programs (operated by public housing agencies)



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### Uniform Physical Condition Standards (UPCS)

- *Infestation*: presence of rats; or infestation by mice or insects, such as roaches or termites.
- *Deficiency*: evidence of infestation of insects—including roaches and ants—throughout a unit or room, especially in food preparation and storage areas.
- *Deficiency*: evidence of rats or mice: sightings, rat or mouse holes, droppings.

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### HUD's Housing Choice Vouchers

Housing Quality Standard (HQS)

- The dwelling unit and its equipment must be free of vermin and rodent infestation (m)(2)
- The site and neighborhood may not be subject to serious adverse environmental conditions, natural or manmade, such as . . . vermin or rodent infestations (l)(2)
- The exterior wall structure and surface must not have any serious defects that may result in air infiltration or vermin infestation (g)(2)

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### HUD's conventional public housing

#### Physical Survey Questions

Presence of rats or severe infestations of mice or insects (cockroaches, termites) observed

- Insects
  - Frass, shells, or other evidence
  - One or more live cockroaches
- Rats, mice, or vermin
  - Droppings or chewable holes
  - One or more live rats or mice
- Other insects or vermin observed

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### Some Project-based Section 8 Properties are Mark-to-Market

#### Mark-to-Market Program

- Section 8 Properties participating in the Mark-to-Market (M2M) program must have an IPM inspection as part of its Physical Condition Assessment
- M2M participants must adopt and follow an IPM plan to qualify for funding from HUD's Green Initiative Program

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### HUD's guidance on integrated pest management

- PIH guidance since 2006
- "IPM offers the potential to ensure efficacy of pest elimination while protecting the health of residents, staff, and the environment."
- "Most of the effective methods of pest elimination... will extend the useful life of a building and as a result generate significant savings that could offset the costs of the pest control."
- "IPM effectively eliminates pests in safer and long term cost-effective ways than traditional pesticide treatments."

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### Applicable local housing codes

Typical local housing code

- All structures shall be kept free from insect and rodent infestation
- All structures in which insects or rodents are found shall be promptly managed by approved processes that will not be injurious to human health
- Proper precautions shall be taken to prevent re-infestation

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### IPM does more than control pests

- Educating residents empowers them to improve their housekeeping and provides a marketable skill
- Fixing pest entrances helps to weatherize buildings and keep them dry
- Monitoring for pests allows for early intervention before the problem gets out of hand
- When people learn that they can do something to improve their living conditions, expectations for pest control will rise!

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### IPM in practice: Documentation is key

One IPM log in each building

Record:

- date
- detailed observations
- action taken

Make sure action is taken promptly



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### IPM log contents

- Service schedule
- Service log
- Applicator licenses
- Proof of insurance and business registration
- Contract/service agreement
- Potential notifications/preparation instructions
- Product labels and Material Safety Data Sheets (MSDS) for all pesticides
- Educational materials for staff and residents

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### At first more work, but then less

- Starting an IPM program may mean more work because of education, repairs, and monitoring
- Expect to see increased work orders as pests and pest-friendly conditions that were previously overlooked are reported
- THEN...you will get fewer complaints, have fewer pests, and be providing a better place to live



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### Another view

- **Invest**  
time and materials for repair and education
- **Protect**  
through exclusion, sanitation, and careful product choice based on least risk to human health and the environment and compatibility with other management practices
- **Maintain**  
with monitoring, communication, and documentation so that infestations do not grow

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## Pesticides

Why do people tolerate exposure to pests and pesticides?

- They are used to living with problems
- Low standards for pest control and maintenance
- Other priorities
- Not aware of the problems
- Cannot envision a better way

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## Routine spraying of pesticides is not the only option

We've learned a better way



Routine baseboard spraying is not part of IPM

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## Concerns with pesticides

- Pests can become tolerant of or avoid pesticides
- Risk from exposure may outweigh the benefit of killing pests
- Possible harm to pets and wildlife
- Certain populations may be especially vulnerable or sensitive to some pesticides:
  - Elderly, children, pregnant women
  - People with breathing or lung disorders such as asthma
  - People with chemical sensitivities

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## How to handle illegal and risky pesticides



Unlabeled Mothballs Chinese Chalk Tres Pasitos  
Products without a pesticide label are illegal

- Educate residents on the dangers of using illegal pesticides. For example, pesticides that look like candy are risky.
- Report illegal sales to the EPA or to the state pesticide licensing agency.

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## Total release foggers (there's a reason they're called bombs!)



San Diego, CA,  
July 1992



Augusta, GA, March 2008



Washington, DC,  
August 2008



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## Pesticide risk by application method

Less risk of exposure ← → More risk of exposure

Tamper-resistant station

Gel bait in a crevice

Total release fogger

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### How to read a label

- Product name
- Active Ingredients
- Signal words:

**CAUTION** = slightly toxic

**WARNING** = moderately toxic

**DANGER** = severe skin or eye irritation

**DANGER—POISON** = highly toxic



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### How to read a label

- Registration number: "EPA Reg. No."
- Precautionary Statements
- Directions for:
  - Use
  - Storage
  - Disposal



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### Product use and emergencies

National Pesticide Information Center  
800-858-7378  
[www.npic.orst.edu](http://www.npic.orst.edu)

Poison Control Center National Hotline  
800-222-1222  
[www.aapcc.org](http://www.aapcc.org)

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**Questions?**

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